EXHIBIT A

<u>PARTIES' PROPOSED CONSTRUCTIONS</u>

	'651 Patent				
	Term or Phrase	Party Proposing Term for Construction	Ocean's Proposed Construction	Defendants' Proposed Construction	Court's Construction
1	"pneumatic cylendar" Asserted claims: 19-24, 75, and 81	All Parties	No construction is necessary, or in the alternative, "a pneumatic, hydraulic, electromagnetic or mechanical device"	Plain and ordinary meaning	
2	"said process chamber" Asserted claims: 31, 32, and 34-37	All Parties	"said process tool"	Indefinite	

	'305 and '248 Patents				
	Term or Phrase	Party Proposing Term for Construction	Ocean's Proposed Construction	Defendants' Proposed Construction	Court's Construction
1	"software scheduling agent" Asserted claims: 1-5 and 7-11 ('305 patent), 1-12 ('248 patent)	Defendants	No construction is necessary	"a software agent that schedules, initiates, and executes activities on behalf of a single manufacturing domain entity"	

		'097 Patent			
	Term or Phrase	Party Proposing Term for Construction	Ocean's Proposed Construction	Defendants' Proposed Construction	Court's Construction
1	"ultra thin resist layer[s]" Asserted claims: 1-14 and 17	Defendants	No construction is necessary	Indefinite	

		'330 Patent			
	Term or Phrase	Party Proposing Term for Construction	Ocean's Proposed Construction	Defendants' Proposed Construction	Court's Construction
1	"concurrently measuring" Asserted claims: 19-21	Defendants	No construction is necessary	"simultaneously measuring with a single measuring tool"	

	Term or Phrase	Party Proposing Term for Construction	Ocean's Proposed Construction	Defendants' Proposed Construction	Court's Construction
			'538 Patent		
1	"significant fault" Asserted claims: 5	All Parties	No construction is necessary, or in the alternative, "abnormality or fault that relates to an actual fault"	Indefinite	
2	"determining in said computer whether said parameter is a significant factor" Asserted claims: 7	All Parties	No construction is necessary, or in the alternative, "a parameter that provides a significant contribution to the fault"	Indefinite	